



Sanford Heisler Sharp, LLP
1350 Avenue of the Americas, Floor 31
New York, NY 10019
Telephone: (646) 402-5650
Fax: (646) 402-5651
www.sanfordheisler.com

Alexandra Harwin, Partner
Co-Chair of National Title VII Practice
(646) 401-0475
aharwin@sanfordheisler.com

New York | Washington D.C. | San Francisco | San Diego | Nashville | Baltimore

September 4, 2020

VIA ECF

The Honorable Katharine H. Parker
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. This joint status letter is submitted on behalf of all parties as directed in the Court's Order of July 27, 2020 (Dkt. No. 35).

Since the parties' last status letter, Plaintiff has moved forward diligently with the review and production of ESI, and Plaintiff anticipates continuing to produce ESI on a rolling basis. Defendants have encountered technological problems that have delayed their review and production of ESI, and Plaintiff is awaiting Defendants' provision of information required by the parties' Stipulation and Order Regarding Production of Electronically Stored Information (Dkt. No. 29) in order to facilitate the resolution of ESI disputes. Likewise, the parties remain in discussions regarding purported deficiencies in their respective discovery responses, which the parties are also working towards resolving.

While Defendants are hopeful to promptly resolve the technological problems they are currently facing, it is possible that they may need to switch ESI vendors. Defendants anticipate having greater clarity concerning the existence of any possible ESI disputes and the timeframe for their ESI production after they receive additional information from their current ESI vendor, which they expect to obtain next week.

As the parties are awaiting information concerning the above issues, the parties are not requesting relief from the Court at this time.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Alexandra Harwin', followed by a large, stylized star-like flourish.

Alexandra Harwin